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Ireland

**WASTE LICENCE
Proposed Decision**

Licence Register Number: 113-2

Applicant/Licensee: KMK Metals Recycling Limited

Location of Facility: Cappincur Industrial Estate,
Daingean Road, Tullamore, County
Offaly.

INTRODUCTION

This introduction is not part of the licence and does not purport to be a legal interpretation of the licence.

This waste licence is for the recovery of metallic waste at the facility of KMK Metals Recycling Limited. The facility will be permitted to accept up to 10,000 tonnes of wastes per annum for processing and recovery. Both hazardous and non-hazardous waste can be accepted at the facility. The waste activities permitted to be carried out at the facility include

- The sorting and processing of metallic wastes and waste electrical and electronic equipment (WEEE) for recovery; and
- The storage of liquid and metallic waste sludge for recovery.

The company has to keep records of waste intake and recovery, carry out regular environmental monitoring and submit all monitoring results and a number of reports on the operation and management of the facility to the Agency.

The licence sets out in detail the conditions under which KMK Metals Recycling Limited will operate and manage this facility.

Table of Contents

	Page No.
Glossary of Terms	1
Decision & Reasons for the Decisions	5
Part I Schedule of Activities Licensed	6
Part II Schedule of Activities Refused	6
Part III Conditions	7
Condition 1. Scope	7
Condition 2. Management of the Facility	8
Condition 3. Infrastructure and Operation	9
Condition 4. Interpretation	12
Condition 5. Emissions	13
Condition 6. Control and Monitoring	13
Condition 7. Resource Use and Energy Efficiency	15
Condition 8. Materials Handling	15
Condition 9. Accident Prevention and Emergency Response	17
Condition 10. Decommissioning and Residuals Management	17
Condition 11. Notifications, Records and Reports	18
Condition 12. Financial Charges and Provisions	20
SCHEDULE A: Limitations	21
SCHEDULE B: Emission Limits	22
SCHEDULE C: Control &Monitoring	23
SCHEDULE D: Annual Environmental Report	26

Glossary of Terms

All terms in this licence should be interpreted in accordance with the definitions in the Waste Management Acts 1996 to 2003, (the Acts), unless otherwise defined in this section.

Aerosol	A suspension of solid or liquid particles in a gaseous medium.
Adequate lighting	20 lux measured at ground level.
AER	Annual Environmental Report.
Agreement	Agreement in writing.
Annually	At approximately twelve monthly intervals. All or part of a period of twelve consecutive months.
Attachment	Any reference to Attachments in this licence refers to attachments submitted as part of this licence application.
Application	The application by the licensee for this licence.
Appropriate facility	A waste management facility, duly authorised under relevant law and technically suitable.
BAT	Best Available Techniques.
Bi-annually	All or part of a period of six consecutive months.
Biennially	Once every two years.
Biodegradable waste	Any waste that is capable of undergoing anaerobic or aerobic decomposition, such as food, garden waste, sewage sludge, paper and paperboard.
BOD	5 day Biochemical Oxygen Demand.
CEN	Comité Européen De Normalisation – European Committee for Standardisation
COD	Chemical Oxygen Demand.
Construction and Demolition Waste	Wastes that arise from construction, renovation and demolition activities: Chapter 17 of the EWC or as otherwise may be agreed.
Containment boom	A boom which can contain spillages and prevent them from entering drains or watercourses or from further contaminating watercourses.
Daily	During all days of plant operation, and in the case of emissions, when emissions are taking place; with at least one measurement on any one day.
Day	Any 24 hour period.
Daytime	0800 hrs to 2200 hrs.
dB(A)	Decibels (A weighted).

DO	Dissolved Oxygen.
Documentation	Any report, record, result, data, drawing, proposal, interpretation or other document in written or electronic form which is required by this licence.
Drawing	Any reference to a drawing or drawing number means a drawing or drawing number contained in the application, unless otherwise specified in this licence.
EMP	Environmental Management Programme.
Emission Limits	Those limits, including concentration limits and deposition rates established in <i>Schedule B: Emission Limits</i> , of this licence.
EPA	Environmental Protection Agency.
European Waste Catalogue (EWC)	A harmonised, non-exhaustive list of wastes drawn up by the European Commission and published as Commission Decision 2000/532/EC and any subsequent amendment published in the Official Journal of the European Community.
Facility	Any site or premises used for the purposes of the recovery or disposal of waste.
Fortnightly	A minimum of 24 times per year, at approximately two week intervals.
GC/MS	Gas Chromatography/Mass Spectroscopy
Green waste	Waste wood (excluding timber), plant matter such as grass cuttings, and other vegetation.
Heavy Metals	This term is to be interpreted as set out in “Parameters of Water Quality, Interpretation and Standards” published by the Agency in 2001. ISBN 1-84095-015-3.
HFO	Heavy Fuel Oil.
Hours of Operation	The hours during which the facility is authorised to be operational.
Hours of Waste Acceptance	The hours during which the facility is authorised to accept waste.
ICP	Inductively Coupled Plasma Spectroscopy.
Incident	The following shall constitute an incident for the purposes of this licence: <ul style="list-style-type: none">a) an emergency;b) any emission which does not comply with the requirements of this licence;c) any exceedence of the daily duty capacity of the waste handling equipment;d) any trigger level specified in this licence which is attained or exceeded; and,e) any indication that environmental pollution has, or may have, taken place.
Industrial Waste	As defined in Section 5(1) of the Waste Management Acts 1996 to 2003.

Inert waste	Waste that does not undergo any significant physical, chemical or biological transformations. Inert waste will not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter with which it comes into contact in a way likely to give rise to environmental pollution or harm human health. The total leachability and pollutant content of the waste and the ecotoxicity of the leachate must be insignificant, and in particular not endanger the quality of surface water and/or groundwater.
K	Kelvin.
kPa	Kilo Pascals.
Landfill Directive	Council Directive 1999/31/EC.
Leq	Equivalent continuous sound level.
Licensee	KMK Metals Recycling Limited.
Liquid Waste	Any waste in liquid form and containing less than 2% dry matter.
List I	As listed in the EC Directives 76/464/EEC and 80/68/EEC and amendments.
List II	As listed in the EC Directives 76/464/EEC and 80/68/EEC and amendments.
Local Authority	Offaly County Council.
Maintain	Keep in a fit state, including such regular inspection, servicing, calibration and repair as may be necessary to adequately perform its function.
Mass Flow Limit	An emission limit value which is expressed as the maximum mass of a substance which can be emitted per unit time.
Mass Flow Threshold	A mass flow rate, above which, a concentration limit applies.
Mobile Plant	Self-propelled machinery used for the emplacement of wastes or for the construction of specified engineering works.
Monthly	A minimum of 12 times per year, at approximately monthly intervals.
Night-time	2200 hrs to 0800 hrs.
Noise Sensitive Location (NSL)	Any dwelling house, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other facility or area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels.
Oil Separator	Device installed according to the specification: I.S. EN 585-2:2003 (separator systems for light liquids).
PER	Pollution Emission Register.
Quarterly	All or part of a period of three consecutive months beginning on the first day of January, April, July or October.
Recyclable Materials	Those waste types, such as cardboard, batteries, gas cylinders, etc, which may be recycled.

Regional Fisheries Board	Shannon Regional Fisheries Board.
Sanitary Authority	Offaly County Council.
Sample(s)	Unless the context of this licence indicates to the contrary, samples shall include measurements by electronic instruments.
Sludges	The accumulation of solids resulting from chemical coagulation, flocculation and/or sedimentation after water or wastewater treatment, with greater than 2% dry matter.
SOP	Standard Operating Procedure.
Standard Method	A National, European or internationally recognised procedure (eg. I.S. EN, ISO, CEN, BS or equivalent), as an in-house documented procedure based on the above references, a procedure as detailed in the current edition of “Standard Methods for the Examination of Water and Wastewater”, (prepared and published jointly by A.P.H.A., A.W.W.A & W.E.F), American Public Health Association, 1015 Fifteenth Street, N.W., Washington DC 20005, USA; or, an alternative method as may be agreed by the Agency.
Storm Water	Rain water run-off from roof and non-process areas.
The Agency	Environmental Protection Agency.
TOC	Total Organic Carbon.
Trade Effluent	Trade Effluent has the meaning given in the Water Pollution Acts 1977 and 1990.
Trigger Level	A parameter value, the achievement or exceedance of which requires certain actions to be taken by the licensee.
WEEE	Waste Electrical and Electronic Equipment as specified in Directive 2002/96/EC.
Weekly	During all weeks of plant operation, and in the case of emissions, when emissions are taking place; with at least one measurement in any one week.
WWTP	Waste Water Treatment Plant.

Decision & Reasons for the Decisions

Reasons for the Decision

The Agency is satisfied, on the basis of the information available, that subject to compliance with the conditions of this licence, any emissions from the activity will comply with and will not contravene any of the requirements of Section 40(4) of the Waste Management Acts 1996 to 2003.

In reaching this decision the Environmental Protection Agency has considered the application and supporting documentation received from the applicant, and the report of its inspector.

Part I Schedule of Activities Licensed

In pursuance of the powers conferred on it by the Waste Management Acts 1996 to 2003, the Environmental Protection Agency (the Agency) proposes, under Section 46(2) of the said Act to grant this Waste Licence to KMK Metals Recycling Limited to carry on the waste activities listed below at KMK Metals Recycling Limited, Cappincur Industrial Estate, Daingean Road, Tullamore, County Offaly subject to conditions, with the reasons therefor and the associated schedules attached thereto set out in the licence.

Licensed Waste Disposal Activities, in accordance with the Third Schedule of the Waste Management Acts 1996 to 2003

Not Applicable

Licensed Waste Recovery Activities, in accordance with the Fourth Schedule of the Waste Management Acts 1996 to 2003

Class 3.	Recycling or reclamation of metals and metal compounds.
Class 4.	Recycling or reclamation of other inorganic materials.
Class 6.	Recovery of components used for pollution abatement.
Class 7.	Recovery of components from catalysts.
Class 11.	Use of waste obtained from any activity referred to in a preceding paragraph of this Schedule.
Class 12.	Exchange of waste for submission to any activity referred to in a preceding paragraph of this Schedule.
Class 13.	Storage of waste intended for submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where such waste is produced.

Part II Schedule of Activities Refused

None of the proposed activities as set out in the licence application have been refused.

Part III Conditions

Condition 1. Scope

- 1.1 Waste activities at this facility shall be restricted to those listed and described in Part I Activities Licensed and shall be as set out in the licence application or as modified under Condition 1.4 of this licence and subject to the conditions of this licence.
- 1.2 The facility shall be controlled, operated, and maintained and emissions shall take place as set out in this licence. All programmes required to be carried out under the terms of this licence, become part of this licence.
- 1.3 For the purposes of this licence, the facility authorised by this licence, is the area of land outlined in red on Map B2.1 Revised site plan for KMK Metals Recycling Limited Site of the application. Any reference in this licence to “facility” shall mean the area thus outlined in red. The licensed activities shall be the carried on only within the area outlined.
- 1.4 No alteration to, or reconstruction in respect of, the activity or any part thereof which would, or is likely to, result in
- (a) a material change or increase in:
- The nature or quantity of any emission,
 - The abatement/treatment or recovery systems,
 - The range of processes to be carried out,
 - The fuels, raw materials, intermediates, products or wastes generated, or
- (b) any changes in:
- Site management infrastructure or control with adverse environmental significance,
- shall be carried out or commenced without prior notice to, and without the agreement of, the Agency.
- 1.5 This licence is for the purposes of waste licensing under the Waste Management Acts 1996 to 2003 only and nothing in this licence shall be construed as negating the licensee’s statutory obligations or requirements under any other enactments or regulations.
- 1.6 This licence is being granted in substitution for the waste licence granted to the licensee on 20 December 2001 and bearing Register No.: 113-1. The previous waste licence (Reg. No. 113-1) is superceded by this licence.
- 1.7 Activities at this facility shall be limited as set out in *Schedule A: Limitations*, of this license.
- 1.8 Waste Acceptance Hours and Hours of Operation
- 1.8.1 Waste shall be accepted at the facility only between the hours of 08:00 and 22:00 Monday to Friday inclusive and 08:00 and 13:00 on Saturdays.
- 1.8.2 The facility shall be operated only during the hours of 08:00 and 20:00 Monday to Friday inclusive and 08:00 and 13:00 on Saturdays.
- 1.8.3 Waste shall not be accepted at the facility on Sundays or on Bank Holidays unless otherwise agreed with the Agency.

Reason: To clarify the scope of this licence.

Condition 2. Management of the Facility

2.1 Facility Management

- 2.1.1 The licensee shall employ a suitably qualified and experienced facility manager who shall be designated as the person in charge. The facility manager or a nominated, suitably qualified and experienced, deputy shall be present on the facility at all times during its operation or as otherwise required by the Agency.
- 2.1.2 The licensee shall ensure that personnel performing specifically assigned tasks shall be qualified on the basis of appropriate education, training and experience, as required and shall be aware of the requirements of this licence.
- 2.1.3 Both the facility manager and deputy, and any replacement manager or deputy, shall successfully complete both the FAS Waste Management Training Programme (or equivalent agreed by the Agency) and associated on site assessment appraisal within twelve months of appointment

2.2 Environmental Management System (EMS)

- 2.2.1 The licensee shall establish and maintain an Environmental Management System (EMS). The EMS shall be updated on an annual basis and submitted to the Agency as part of the Annual Environmental Report (AER).
- 2.2.2 The EMS shall include as a minimum the following elements:
 - 2.2.2.1 Management and Reporting Structure.
 - 2.2.2.2 Schedule of Environmental Objectives and Targets.

The licensee shall prepare a Schedule of Environmental Objectives and Targets. The Schedule shall as a minimum provide for a review of all operations and processes, including an evaluation of practicable options, for energy and resource efficiency, the use of cleaner technology, cleaner production, and the prevention, reduction and minimisation of waste, and shall include waste reduction targets. The Schedule shall include time frames for the achievement of set targets and shall address a five year period as a minimum. The Schedule shall be reviewed annually and amendments thereto notified to the Agency for agreement as part of the Annual Environmental Report (AER).

2.2.2.3 Environmental Management Programme (EMP)

The licensee shall, not later than six months from the date of grant of this licence, submit to the Agency for agreement an EMP, including a time schedule, for achieving the Environmental Objectives and Targets prepared under Condition 2.2.2.2. Once agreed the EMP shall be established and maintained by the licensee. It shall include:

- (a) designation of responsibility for targets;
- (b) the means by which they may be achieved;
- (c) the time within which they may be achieved.

The EMP shall be reviewed annually and amendments thereto notified to the Agency for agreement as part of the Annual Environmental Report (AER) (Condition 11.7).

A report on the programme, including the success in meeting agreed targets, shall be prepared and submitted to the Agency as part of the AER. Such reports shall be retained on-site for a period of not less than seven years and shall be available for inspection by authorised persons of the Agency.

2.2.2.4 Documentation

- (i) The licensee shall establish and maintain an environmental management documentation system which shall be to the satisfaction of the Agency.
- (ii) The licensee shall issue a copy of this licence to all relevant personnel whose duties relate to any condition of this licence.

2.2.2.5 Corrective Action

The licensee shall establish procedures to ensure that corrective action is taken should the specified requirements of this licence not be fulfilled. The responsibility and authority for initiating further investigation and corrective action in the event of a reported non-conformity with this licence shall be defined

2.2.2.6 Awareness and Training

The licensee shall establish and maintain procedures for identifying training needs, and for providing appropriate training, for all personnel whose work can have a significant effect upon the environment. Appropriate records of training shall be maintained

2.2.2.7 Communications Programme

The licensee shall establish and maintain a Communications Programme to ensure that members of the public can obtain information at the facility, at all reasonable times, concerning the environmental performance of the facility.

Reason: To make provision for management of the activity on a planned basis having regard to the desirability of ongoing assessment, recording and reporting of matters affecting the environment.

Condition 3. Infrastructure and Operation

- 3.1 The licensee shall establish all infrastructure referred to in this licence prior to the commencement of the licensed activities or as required by the conditions of this licence.
- 3.2 Facility Notice Board
 - 3.2.1 The licensee shall provide and maintain a Facility Notice Board on the facility so that it is legible to persons outside the main entrance to the

- facility. The minimum dimensions of the board shall be 1200 mm by 750 mm.
- 3.2.2 The board shall clearly show:-
- a) the name and telephone number of the facility;
 - b) the normal hours of opening;
 - c) the name of the licence holder;
 - d) an emergency out of hours contact telephone number;
 - e) the licence reference number; and
 - f) where environmental information relating to the facility can be obtained.
- 3.3 Facility Security
- 3.3.1 Security and stockproof fencing and gates shall be installed and maintained. The base of the fencing shall be set in the ground.
- 3.3.2 Gates shall be locked shut when the facility is unsupervised.
- 3.3.3 The licensee shall provide and use adequate lighting during the operation of the facility in hours of darkness.
- 3.3.4 The licensee shall remedy any defect in the gates and/or fencing as follows:-
- (a) a temporary repair shall be made by the end of the working day; and
 - (b) a repair to the standard of the original gates and/or fencing shall be undertaken within three working days.
- 3.4 Facility Roads and Site Surfaces
- 3.4.1 Effective site roads shall be provided and maintained to ensure the safe movement of vehicles within the facility.
- 3.4.2 The licensee shall provide and maintain an impermeable concrete surface on all working areas of the facility, the surfaces shall be concreted and constructed to British Standard 8110 or an alternative as agreed by the Agency.
- 3.5 Facility Office
- 3.5.1 The licensee shall provide and maintain an office at the facility. The office shall be constructed and maintained in a manner suitable for the processing and storing of documentation.
- 3.5.2 The licensee shall provide and maintain a working telephone and a method for electronic transfer of information at the facility.
- 3.6 Waste Inspection and Quarantine Areas
- 3.6.1 A Waste Inspection Area and a Waste Quarantine Area shall be provided and maintained at the facility.
- 3.6.2 These areas shall be constructed and maintained in a manner suitable, and be of a size appropriate, for the inspection of waste and subsequent quarantine if required. The waste inspection area and the waste quarantine area shall be clearly identified and segregated from each other.
- 3.7 The licensee shall provide and maintain a weighbridge at the facility within six months of the date of grant of this licence.

- 3.8 Waste handling, ventilation and processing plant
- 3.8.1 Items of plant deemed critical to the efficient and adequate processing of waste at the facility (including *inter alia* waste loading vehicles and ejector trailers) shall be provided on the following basis:-
- (a) 100% duty capacity;
 - (b) 20% standby capacity available on a routine basis; and
 - (c) Provision of contingency arrangements and/or back up and spares in the case of breakdown of critical equipment.
- 3.8.2 The licensee shall, prior to the commencement of the processing of WEEE, provide a report for the agreement of the Agency detailing the duty and standby capacity in tonnes per day, of all waste handling and processing equipment to be used at the facility. These capacities shall be based on the licensed waste intake, as per *Schedule A: Limitations*, of this licence.
- 3.8.3 The quantity of waste to be accepted at the facility on a daily basis shall not exceed the duty capacity of the equipment at the facility. Any exceedance of this intake shall be treated as an incident.
- 3.9 Wastewater Treatment System
- 3.9.1 The licensee shall provide and maintain a wastewater treatment system at the facility for the treatment of sanitary effluent arising on-site. The percolation area shall satisfy the criteria set out in the Wastewater Treatment Manual, *Treatment Systems for Single Houses*, published by the Environmental Protection Agency.
- 3.10 The licensee shall install on all emission points such sampling points or equipment, including any data-logging or other electronic communication equipment, as may be required by the Agency. All such equipment shall be consistent with the safe operation of all sampling and monitoring systems.
- 3.11 Sampling equipment shall be operated and maintained such that sufficient sample is collected to meet both internal monitoring requirements and those of the Agency. A separate composite sample or homogeneous sub-sample (of sufficient volume as advised) should be refrigerated immediately after collection and retained as required for EPA use.
- 3.12 The licensee shall clearly label and provide safe and permanent access to all on-site sampling and monitoring points and to off-site points as required by the Agency.
- 3.13 Tank and Drum Storage Areas
- 3.13.1 All tank and drum storage areas shall be rendered impervious to the materials stored therein.
- 3.13.2 All tank and drum storage areas shall, as a minimum, be bunded, either locally or remotely, to a volume not less than the greater of the following:-
- (a) 110% of the capacity of the largest tank or drum within the bunded area; or
 - (b) 25% of the total volume of substance which could be stored within the bunded area.
- 3.13.3 All drainage from bunded areas shall be diverted for collection and safe disposal.

- 3.13.4 All inlets, outlets, vent pipes, valves and gauges must be within the bunded area.
- 3.13.5 All tanks and drums shall be labelled to clearly indicate their contents.
- 3.14 The licensee shall have in storage an adequate supply of containment booms and/or suitable absorbent material to contain and absorb any spillage at the facility. Once used the absorbent material shall be disposed of at an appropriate facility.
- 3.15 Silt Traps and Oil Separators
- 3.15.1 The licensee shall install and maintain silt traps and oil separator at the facility to ensure that all storm water discharges from the facility pass through a silt trap and oil separator prior to discharge. The separator shall be a Class I full retention separator and the silt traps and separator shall be in accordance with I.S. EN 585-2:2003 (separator systems for light liquids).
- 3.16 All wellheads, whose locations are shown on Map J1, Attachment J of the licence application shall be adequately protected to prevent contamination or physical damage.

REASON: To provide for appropriate operation of the facility to ensure protection of the environment.

Condition 4. Interpretation

- 4.1 Emission limit values for emissions to waters in this licence shall be interpreted in the following way:-
- 4.1.1 Discrete sampling
- For parameters other than pH, temperature, no grab sample value shall exceed 1.2 times the emission limit value.
- 4.2 Where the ability to measure a parameter is affected by mixing before emission, then, with agreement from the Agency, the parameter may be assessed before mixing takes place.
- 4.3 Noise
- 4.3.1 Noise from the activity shall not give rise to sound pressure levels (Leq,T) measured at noise sensitive locations which exceed the limit value(s).
- 4.4 Dust and particulate matter
- 4.4.1 Dust and particulate matter from the activity shall not give rise to deposition levels which exceed the limit value(s).

Reason: To clarify the interpretation of emission limit values fixed under the licence.

Condition 5. Emissions

- 5.1 No specified emission from the facility shall exceed the emission limit values set out in *Schedule B: Emission Limits* of this licence. There shall be no other emissions of environmental significance.
- 5.2 The licensee shall ensure that the activities shall be carried out in a manner such that emissions including odours do not result in significant impairment of, and/or significant interference with amenities or the environment beyond the facility boundary.
- 5.3 No substance shall be discharged in a manner, or at a concentration which, following initial dilution, causes tainting of fish or shellfish.
- 5.4 The licensee shall ensure that vermin, birds, flies, mud, dust, litter and odours do not give rise to nuisance at the facility or in the immediate area of the facility. Any method used by the licensee to control any such nuisance shall not cause environmental pollution.

Reason: To provide for the protection of the environment by way of control and limitation of emissions.

Condition 6. Control and Monitoring

- 6.1 The licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as set out below and as in accordance with *Schedule C: Control & Monitoring*, of this licence:
- 6.1.1 Analysis shall be undertaken by competent staff in accordance with documented operating procedures.
- 6.1.2 Such procedures shall be assessed for their suitability for the test matrix and performance characteristics determined.
- 6.1.3 Such procedures shall be subject to a programme of Analytical Quality Control using control standards with evaluation of test responses.
- 6.1.4 Where analysis is sub-contracted it shall be to a competent laboratory.
- 6.2 All automatic monitors and samplers shall be functioning at all times (except during maintenance and calibration) when the activity is being carried on unless alternative sampling or monitoring has been agreed in writing by the Agency for a limited period. In the event of the malfunction of any continuous monitor, the licensee shall contact the Agency as soon as practicable, and alternative sampling and monitoring facilities shall be put in place. Agreement for the use of alternative equipment, other than in emergency situations, shall be obtained from the Agency.
- 6.3 Monitoring and analysis equipment shall be operated and maintained as necessary so that monitoring accurately reflects the emission or discharge.

- 6.4 All treatment/abatement and emission control equipment shall be calibrated and maintained, in accordance with the instructions issued by the manufacturer/supplier or installer.
- 6.5 The frequency, methods and scope of monitoring, sampling and analyses, as set out in this licence, may be amended with the agreement of the Agency following evaluation of test results.
- 6.6 The licensee shall prepare a programme, to the satisfaction of the Agency, for the identification and reduction of fugitive emissions. This programme shall be included in the Environmental Management Programme.
- 6.7 The integrity and water tightness of all bunding structures, underground pipes and tanks and their resistance to penetration by water or other materials carried or stored therein shall be tested and demonstrated by the licensee. This testing shall be carried out by the licensee at least once every three years thereafter and reported to the Agency on each occasion. A written record of all integrity tests and any maintenance or remedial work arising from them shall be maintained by the licensee.
- 6.8 Storm water
- 6.8.1 The drainage system, bunds, silt traps and oil separators shall be inspected weekly, desludged as necessary and properly maintained at all times. All sludge and drainage from these operations shall be collected for safe disposal.
- 6.9 Noise
- 6.9.1 The licensee shall carry out a noise survey of the site operations annually. The survey programme shall be undertaken in accordance with the methodology specified in the 'Environmental Noise Survey Guidance Document' as published by the Agency.
- 6.10 Dust/Odour Control
- 6.10.1 In dry weather, site roads and any other areas used by vehicles shall be sprayed with water as and when required to minimise airborne dust nuisance.
- 6.11 The licensee shall, at a minimum of one week intervals, inspect the facility and its immediate surrounds for nuisances caused by litter, vermin, birds, flies, mud, dust and odours. The licensee shall maintain a record of all nuisance inspections.
- 6.12 Operational Controls
- 6.12.1 The floor of the warehouse buildings shall be cleaned on a weekly basis. The floor of the storage bays for recovered wastes shall be washed down and cleaned on each occasion such bays are emptied, or as a minimum on a weekly basis.
- 6.12.2 Scavenging shall not be permitted at the facility.
- 6.12.3 There shall be no casual public access to the facility.

Reason: To provide for the protection of the environment by way of treatment and monitoring of emissions.

Condition 7. Resource Use and Energy Efficiency

- 7.1 The licensee shall carry out an audit of the energy efficiency of the site within one year of the date of grant of this licence. The audit shall be carried out in accordance with the guidance published by the Agency; “Guidance Note on Energy Efficiency Auditing”. The energy efficiency audit shall be repeated at intervals as required by the Agency.
- 7.2 The audit shall identify all opportunities for energy use reduction and efficiency and the recommendations of the audit will be incorporated into the Schedule of Environmental Objectives and Targets under Condition 2 above.
- 7.3 The licensee shall identify opportunities for reduction in the quantity of water used on site including recycling and reuse initiatives, wherever possible. Reductions in water usage shall be incorporated into Schedule of Environmental Objectives and Targets.
- 7.4 The licensee shall undertake an assessment of the efficiency of use of raw materials in all processes, having particular regard to the reduction in waste generated. The assessment should take account of best international practice for this type of activity. Where improvements are identified, these shall be incorporated into the Schedule of Environmental Objectives and Targets.

Reason: To provide for the efficient use of resources and energy in all site operations.

Condition 8. Materials Handling

- 8.1 Disposal or recovery of waste shall only take place in accordance with the conditions of this licence and in accordance with the appropriate National and European legislation and protocols.
- 8.2 Waste sent off-site for recovery or disposal shall be transported only by an authorised waste contractor. The waste shall be transported only from the site of the activity to the site of recovery/disposal in a manner which will not adversely affect the environment and in accordance with the appropriate National and European legislation and protocols.
- 8.3 The licensee shall ensure that waste prior to transfer to another person shall be classified packaged and labelled in accordance with National, European and any other standards which are in force in relation to such labelling.
- 8.4 Waste shall be stored in designated areas, protected as may be appropriate, against litter, spillage and leachate run-off. The waste is to be clearly labelled and appropriately segregated.
- 8.5 No waste classified as green list waste in accordance with the EU Transfrontier Shipment of Waste Regulations (Council Regulation EEC No.259/1993, as amended) shall be consigned for recovery without the prior agreement of the Agency.

- 8.6 Waste for disposal/recovery off-site shall be analysed in accordance with *Schedule C: Control & Monitoring*, of this licence.
- 8.7 Unless approved in writing by the Agency the licensee is prohibited from mixing a hazardous waste of one category with a hazardous waste of another category or with any other non-hazardous waste.
- 8.8 All waste processing shall be carried out inside the warehouse buildings as identified in the licence application.
- 8.9 Waste Acceptance and Characterisation Procedures
- 8.9.1 Waste shall only be accepted at the facility, from Local Authority waste collection or transport vehicles or holders of waste permits, unless exempted or excluded, issued under the Waste Management (Collection Permit) Regulations 2001. Copies of these waste collection permits must be maintained at the facility.
- 8.9.2 Waste Acceptance Procedures shall be carried out in accordance with the details submitted in Attachment E3 of the licence application.
- 8.9.3 Waste arriving at the facility shall be inspected at the point of entry to the facility and subject to this inspection, weighed, documented and directed to the appropriate Waste Transfer Building. Each load of waste arriving at the Waste Transfer Building shall be inspected upon tipping within this building. Only after such inspections shall the waste be processed for disposal or recovery.
- 8.9.4 Any waste deemed unsuitable for processing at the facility and/or in contravention of this licence shall be immediately separated and removed from the facility at the earliest possible time. Temporary storage of such wastes shall be in a designated Waste Quarantine Area. Waste shall be stored under appropriate conditions in the quarantine area to avoid putrefaction, odour generation, the attraction of vermin and any other nuisance or objectionable condition.
- 8.9.5 A record of all inspections of incoming waste loads shall be maintained.
- 8.9.6 Waste shall be accepted at the facility only from known customers or new customers subject to initial waste profiling and waste characterisation off-site. The written records of this off-site waste profiling and characterisation shall be retained by the licensee for all active customers and for a two year period following termination of licensee/customer agreements. There shall be no casual public access to the facility.

Reason: To provide for the appropriate handling of materials and the protection of the environment.

Condition 9. Accident Prevention and Emergency Response

- 9.1 The licensee shall, within six months of date of grant of this licence, ensure that a documented Accident Prevention Policy is in place which will address the hazards on-site, particularly in relation to the prevention of accidents with a possible impact on the environment. This procedure shall be reviewed annually and updated as necessary.
- 9.2 The licensee shall, within six months of date of grant of this licence, ensure that a documented Emergency Response Procedure is in place, which shall address any emergency situation which may originate on-site. This Procedure shall include provision for minimising the effects of any emergency on the environment. This procedure shall be reviewed annually and updated as necessary.
- 9.3 In the event of an incident the licensee shall immediately:-
- (i) isolate the source of any such emission;
 - (ii) carry out an immediate investigation to identify the nature, source and cause of the incident and any emission arising therefrom;
 - (iii) evaluate the environmental pollution, if any, caused by the incident;
 - (iv) identify and execute measures to minimise the emissions/malfunction and the effects thereof;
 - (v) identify the date, time and place of the incident
 - (vi) provide a proposal to the Agency for its agreement within one month of the incident occurring or as otherwise agreed with the Agency to:-
 - identify and put in place measures to avoid reoccurrence of the incident; and
 - identify and put in place any other appropriate remedial action.

Reason: To provide for the protection of the environment.

Condition 10. Decommissioning and Residuals Management

- 10.1 Following termination, or planned cessation for a period greater than six months, of use or involvement of all or part of the site in the licensed activity, the licensee shall, to the satisfaction of the Agency, decommission, render safe or remove for disposal/recovery, any soil, subsoils, buildings, plant or equipment, or any waste, materials or substances or other matter contained therein or thereon, that may result in environmental pollution. The licensee shall carry out such tests, investigation or submit certification, as requested by the Agency, to confirm that there is no risk to the environment.

Reason: To make provision for the proper closure of the activity ensuring protection of the environment.

Condition 11. Notifications, Records and Reports

11.1 The licensee shall notify the Agency by both telephone and either facsimile or electronic mail, if available, to the Agency's Headquarters in Wexford, or to such other Agency office as may be specified by the Agency, as soon as practicable after the occurrence of any of the following:

11.1.1 Any release of environmental significance to atmosphere from any potential emission point.

11.1.2 Any emission which does not comply with the requirements of this licence.

11.1.3 Any malfunction or breakdown of key control equipment or monitoring equipment set out in *Schedule C: Control & Monitoring*, of this license which is likely to lead to loss of control of the abatement system.

11.1.4 Any incident with the potential for environmental contamination of surface water or groundwater, or posing an environmental threat to air or land, or requiring an emergency response by the Local Authority..

The licensee shall include as part of the notification, date and time of the incident, summary details of the occurrence, and where available, the steps taken to minimise any emissions.

11.2 In the case of any incident which relates to discharges to water, the licensee shall notify the Local Authority and the Shannon Regional Fisheries Board as soon as practicable after such an incident.

11.3 The licensee shall make a record of any incident. This record shall include details of the nature, extent, and impact of, and circumstances giving rise to, the incident. The record shall include all corrective actions taken to; manage the incident, minimise wastes generated and the effect on the environment, and avoid recurrence. The licensee shall as soon as practicable following incident notification, submit to the Agency the incident record.

11.4 The licensee shall record all complaints of an environmental nature related to the operation of the activity. Each such record shall give details of the date and time of the complaint, the name of the complainant and give details of the nature of the complaint. A record shall also be kept of the response made in the case of each complaint.

11.5 The licensee shall record all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence and all other such monitoring which relates to the environmental performance of the facility.

- 11.6 The licensee shall as a minimum keep the following documents at the site:-
- (i) the licences relating to the facility;
 - (ii) the current EMS for the facility;
 - (iii) the previous year's AER for the facility;
 - (iv) records of all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence and all other such monitoring which relates to the environmental performance of the facility;
 - (v) an up-to-date site drawing/plan showing the locations of key process and environmental infrastructure, including monitoring locations and emission points;
 - (vi) relevant correspondence with the Agency.
- 11.7 The licensee shall submit to the Agency, by the 31st March of each year, an AER covering the previous calendar year. This report, which shall be to the satisfaction of the Agency, shall include as a minimum the information specified in *Schedule D: Annual Environmental Report*, of this licence and shall be prepared in accordance with any relevant guidelines issued by the Agency.
- 11.8 A full record, which shall be open to inspection by authorised persons of the Agency at all times, shall be kept by the licensee on matters relating to the waste management operations and practices at this site. This record shall be maintained on a monthly basis and shall as a minimum contain details of the following:
- 11.8.1 The tonnages and EWC Code for the waste materials taken into and sent off-site for disposal/recovery.
 - 11.8.2 The names of the agent and carrier of the waste, and their waste collection permit details, if required for the waste materials taken into and sent off-site for disposal/recovery (to include issuing authority and vehicle registration number).
 - 11.8.3 Details of the ultimate disposal/recovery destination facility for the waste and its appropriateness to accept the consigned waste stream, to include its permit details and issuing authority.
 - 11.8.4 Written confirmation of the acceptance and disposal/recovery of any hazardous waste consignments sent off-site.
 - 11.8.5 Details of all wastes consigned abroad for recovery and classified as 'Green' in accordance with the EU Transfrontier Shipment of Waste Regulations (Council Regulation EEC No. 259/1993, as amended). The rationale for the classification must form part of the record.
 - 11.8.6 Details of any rejected consignments.
 - 11.8.7 Details of any approved waste mixing.
 - 11.8.8 The results of any waste analyses required under *Schedule C: Control & Monitoring*, of this licence.

11.8.9 The tonnages and EWC Code for the waste materials recovered/disposed on-site.

11.9 Waste Recovery Reports

11.9.1 The licensee shall as part of their EMP prepare a report examining waste recovery options shall be submitted to the Agency for its agreement in the AER. This report shall address methods to contribute to the achievement of the recovery targets stated in national and European Union waste policies and shall include the following:-

- (i) the separation of recyclable materials from the waste and
- (ii) the recovery of metal waste and WEEE.

Reason: To provide for the collection and reporting of adequate information on the activity.

Condition 12. Financial Charges and Provisions

12.1 Agency Charges

12.1.1 The licensee shall pay to the Agency an annual contribution of €6,754, or such sum as the Agency from time to time determines, having regard to variations in the extent of reporting, auditing, inspection, sampling and analysis or other functions carried out by the Agency, towards the cost of monitoring the activity as the Agency considers necessary for the performance of its functions under the Waste Management Acts 1996 to 2003. The first payment shall be a pro-rata amount for the period from the date of this licence to the 31st day of December, and shall be paid to the Agency within one month from the date of the licence. In subsequent years the licensee shall pay to the Agency such revised annual contribution as the Agency shall from time to time consider necessary to enable performance by the Agency of its relevant functions under the Waste Management Acts 1996 to 2003, and all such payments shall be made within one month of the date upon which demanded by the Agency.

12.1.2 In the event that the frequency or extent of monitoring or other functions carried out by the Agency needs to be increased the licensee shall contribute such sums as determined by the Agency to defraying its costs in regard to items not covered by the said annual contribution.

12.2 Environmental Liabilities

12.2.1 The licensee shall as part of the AER provide an annual statement as to the measures taken or adopted at the site in relation to the prevention of environmental damage, and the financial provisions in place in relation to the underwriting of costs for remedial actions following anticipated events or accidents/incidents, as may be associated with the carrying on of the activity.

Reason: To provide for adequate financing for monitoring and financial provisions for measures to protect the environment.

SCHEDULE A: Limitations

A.1 Processes

The following waste related processes are authorised:

- i. Bulking of solid and liquid metallic wastes for transfer to recovery processes
- ii. Shredding, crushing, bailing and repackaging processes
- iii. Storage of metallic wastes prior to recovery/disposal off-site.
- iv. Dismantling and recovery of WEEE

No addition to these processes are permitted unless agreed in advance with the Agency.

A.2 Waste Acceptance

Table A.1 Waste Categories and Quantities

WASTE TYPE	EWC Codes	MAXIMUM (TONNES PER ANNUM)
Hazardous and non-hazardous waste electronic and electrical equipment	16 02 20 01	
Machinery scrap pieces and obsolete metal equipment (iron & steel)	17 04 05	
Textile packaging waste (from metallic wastes arriving on-site)	15 01 09	
Liquid aqueous and organic wastes and concentrates	06 01 11 01 16 03 16 10	Note 1
Hazardous and non-hazardous metals, metal compounds and associated by-products listed in the following sections of Waste licence application Reg No. 113-1: Table E.1.1 (waste categories and quantities) Table E.1.2 (Hazardous waste types and quantities) Table E.1.3 (Non-hazardous waste types) Attachment E.1 (Waste types)		
TOTAL		10,000

Note 1: The licensee shall maintain an inventory of less than 20 tonnes of liquid wastes and concentrates on-site at any time.

SCHEDULE B: Emission Limits

B.1 Emissions to Air

There are no emissions to air of environmental significance.

B.2 Emissions to Water

There are no emissions to water of environmental significance.



B.3 Emission to Sewer

There are no emissions to sewer.



B.4 Noise Emissions

Daytime dB(A) L _{Aeq} (30 minutes)	Night-time dB(A) L _{Aeq} (15 minutes)
55 ^{Note 1}	45 ^{Note 1}

Note 1: There shall be no clearly audible tonal component or impulsive component in the noise emission from the activity at any noise sensitive location.

B.5 Ambient Air Limits:

Measured at the monitoring points indicated in Table J.1 and shown on Figure J.1 of Licence application 113-2 (or as may be amended under Condition 6).

Parameter	Limit Value (mg/m ² /day) ^{Note 1}
Total Dust Deposition	240

Note 1: 30 day composite sample with the results expressed as mg/m²/day.



SCHEDULE C: Control & Monitoring

C.1.1 Control of Emissions to Air

There are no emissions to air of environmental significance.



C.1.2 Monitoring of Emissions to Air

There are no emissions to air of environmental significance.



C.2.1 Control of Emissions to Water

There are no emissions to water of environmental significance.



C.2.2 Monitoring of Emissions to Water

There are no emissions to water of environmental significance.



C.2.3 Monitoring of Stormwater Emission

Emission Point Reference No.: CX and DX ^{Note 1}

Parameter	Monitoring Frequency	Analysis Method/Technique
pH	Bi-annually	pH electrode/meter
Visual Inspection	Monthly	Sample and examine for colour and odour
BOD	Bi-annually	Standard Method
Total Nitrogen	Bi-annually	Standard Method
Conductivity	Quarterly	Standard Method
Suspended Solids	Bi-annually	Standard Method
Metals (Al, As, Cr, Fe, Hg, Ni, Pb and Zn)	Bi-annually	Standard Method

Note 1: Monitoring locations as specified in Attachment J, Map J1 Location of all monitoring points at KMK Metals Recycling Ltd site of licence application.



C.3.1 Control of Emissions to Sewer

There are no emissions to sewer.



C.3.2 Monitoring of Emissions to Sewer

There are no emissions to sewer.



C.4 Noise Monitoring

Location	Measurement	Frequency	Analysis Method or Technique
N1, N4, N5, N7 and N8 ^{Note 1}	L _{Aeq} 15 mins L10 L90 Frequency analysis (1/3 octave band analysis)	Annually	Standard Method

Note 1: Monitoring locations as specified in Attachment J, Map J1 Location of all monitoring points at KMK Metals Recycling Ltd site of licence application.



C.6 Ambient Monitoring

Air Monitoring

Location: D1, D2, D3, D4, D5 and D6^{Note 1}

Parameter	Monitoring Frequency	Analysis Method/Technique
Total dust deposition	Annually	Standard Method (VDI 2119 – German Engineering Institute)
Metal content ^{Note 2}	Annually	Standard Method

Note 1: Monitoring locations as specified in Attachment J, Map J1 Location of all monitoring points at KMK Metals Recycling Ltd site of licence application.

Note 2: Analysis to include the following metals; Al, As, Cd, Cr, Cu, Fe, Hg, Ni, Pb, and Zn

Groundwater Monitoring**Location:** Bore-Holes GW1 and GW2^{Note 1}

Parameter	Monitoring Frequency	Analysis Method/Technique
pH	Annually	pH electrode/meter
Groundwater level	Annually	Standard Method
Visual inspection	Annually	Standard Method
Total faecal coliforms	Annually	Standard Method
Total Nitrogen	Annually	Standard Method
Conductivity	Annually	Standard Method
Chloride	Annually	Standard Method
Organohalogens ^{Note 2}	Annually	Standard Method
Metals	Annually	Standard Method

Note 1: Monitoring locations as specified in Attachment J, Map J1 Location of all monitoring points at KMK Metals Recycling Ltd site of licence application.

Note 2: Screening for priority pollutant list substances (such as US EPA volatile and/or semi-volatile compounds).

SCHEDULE D: Annual Environmental Report

Annual Environmental Report Content ^{Note 1}

Emissions from the facility.
Waste management record.
Resource consumption summary.
Complaints summary.
Schedule of Environmental Objectives and Targets.
Environmental management programme – report for previous year.
Environmental management programme – proposal for current year.
Noise monitoring report summary.
Ambient monitoring summary.
Tank and pipeline testing and inspection report.
Reported incidents summary.
Energy efficiency audit report summary.
Report on the assessment of the efficiency of use of raw materials in processes and the reduction in waste generated.
Reports on financial provision made under this licence, management and staffing structure of the facility, and a programme for public information.
Statement of measures in relation to prevention of environmental damage and remedial actions (Environmental Liabilities).
Any other items specified by the Agency.

Note 1: Content may be revised subject to the agreement of the Agency.

Signed on behalf of the said Agency
on the 12th day of April, 2005

Kieran O'Brien, **Authorised Person**